

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas, 34th Floor
New York, NY 10036-4003
Tel: +1 212 556 2100
Fax: +1 212 556 2222
www.kslaw.com

Israel Dahan
Partner
Direct Dial: +1 212 556 2114
Direct Fax: +1 212 556 2222
idahan@kslaw.com

October 12, 2022

Filed Via ECF

Hon. Sean H. Lane
US Bankruptcy Judge
US Bankruptcy Court, SDNY
300 Quarropas Street
White Plains, NY 10601-4140

**Re: *In re Shem Olam LLC*, Chapter 11, (22-22493) and
Yeshiva Chofetz Chaim, et. al. v. 82 Highview LLC, et. al., (22-07033)**

Dear Judge Lane,

We are counsel to Movants/Plaintiffs Yeshiva Chofetz Chaim, Inc. (“YCC”) and 82 Highview LLC. On September 28, 2022, the Court entered a discovery and briefing schedule concerning the Dismissal Motion and Omnibus Motion filed by Movants/Plaintiffs. *See* Main Case, Doc. 33. We write jointly with counsel for the Debtor and Defendants in the above-referenced matters to advise that the parties have come to agreement on a revised discovery schedule concerning Plaintiffs’ Renewed Dismissal Motion and Amended Omnibus Motion filed on October 10, 2022 (the “Motions”) (*see* Main Case, Doc. 38 and Adversary Proceeding, Doc. 9) and to respectfully request that the Court postpone the October 19, 2022 discovery conference in light of this revised schedule.

The reason for this revised discovery schedule is two-fold: 1) to respect the Jewish holiday – Sukkot – that all parties and most of their counsel are currently celebrating and the Jewish law restricting work during the holiday period that ends on October 18, 2022; and 2) to provide the parties sufficient time after the Sukkot holiday to meet and confer and hopefully resolve any discovery disputes. To this end, the parties have jointly agreed to revise the date for production of documents from October 24, 2022 to Nov 4, 2022, and to revise the dates for depositions from October 25, 2022 through November 14, 2022 to November 7, 2022 through November 23, 2022. To the extent the parties are unable to resolve their discovery disputes, they will alert the Court and request a conference in advance of the new November 4 production date.

The foregoing modifications to the discovery schedule will not alter the dates set forth in the September 28 Order for filing of Defendants' opposition to the Motions and the filing of Movant's reply to the Motions. Accordingly, the parties jointly and respectfully request that the Court approve the above modified discovery schedule to the September 28 Order and postpone the October 19 discovery conference.

Respectfully submitted,

s/ Israel Dahan

Israel Dahan

MEMORANDUM ENDORSED ORDER:

Given the Jewish holiday and the other circumstances of these cases, the Court grants the request to postpone the discovery conference scheduled for October 19, 2022. The parties will meet and confer about any discovery disputes and contact the Court to schedule a discovery conference if necessary.

SO ORDERED.

Dated: October 12, 2022

/s/ Sean H. Lane

United States Bankruptcy Judge